UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT C3E, LLC dba Chem Tech, Bristol, Indiana
FROM:	Jason Schenandoah, Environmental Engineer AECAB (IL/IN)
THRU:	Nathan Frank, Section Supervisor AECAB (IL/IN)
TO:	File

BASIC INFORMATION

Facility Name: C3E, LLC dba Chem Tech

Facility Location: 501 Bloomingdale Dr., Bristol, Indiana 46507

Date of Inspection: August 31, 2022

EPA Inspector(s):
1. Jason Schenandoah, Environmental Engineer
2. Danny Nguyen, Environmental Engineer

Other Attendees:
1. Cameron Erekson, General Manager, Chem Tech
2. Abigail Damschroder, Chemist and Compliance Coordinator, Chem Tech

Contact Email Address: cam.erekson@chemtechadhesives.com

Purpose of Inspection: To ensure compliance with the Clean Air Act

Facility Type: Adhesives manufacturer

Regulations Central to Inspection: The Chemical Accident Prevention Provisions (CAPP) at 40 C.F.R. Part 68

Arrival Time: 8:30 am
Departure Time: 1:00 pm

Inspection Type:

☐ Unannounced Inspection
☒ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Provided Small Business Resource Information Sheet
☐ Small Business Resource Information Sheet not provided. Reason:
☒ Provided CBI warning to facility

The following information was obtained verbally from Chem Tech personnel unless otherwise noted.

Company Ownership: Mr. Cam Erekson and his brother purchased the 501 Bloomingdale Dr., Bristol, Indiana facility (the Facility) in 2017 from Chem Tech.

Process Description:
The CAPP process chemical used at the Facility is a blend of butane and propane called AB-80 and it is used as an aerosol. AB-80 is brought into the Facility via tanker truck and is loaded into a horizontal pressure vessel to await use. Adhesives are manufactured at the Facility through a batch blending process. The adhesives are canned with aerosols to be sold or it is sold in bulk via 55-gallon drums or 5-gallon totes. 100-gallon transfer tanks are used to bring AB-80 from the pressure vessel to the aerosol process. The aerosol process begins with the filler operator filling cans with concentrated adhesive and passing the can to the valver. The valver then manually adds valves to the cans and passes the can to a crimper. The crimper will then crimp the can and add the aerosol gasses. A tip and cap is then added to the can before being placed into boxes. The boxes are then labeled and sent to storage in the Facility to await shipment via truck.

Staff Interview: No Risk Management Plan (RMP) was in place prior to 2019 as the Facility was unaware that they were subject to the CAPP.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:
EPA inspectors toured the horizontal storage tank outside the Facility and the production area inside the Facility. There was no visible windsock at the Southeast exit near the horizontal storage tank that could be used as an emergency exit. The EPA inspectors also noticed foil wrapped around piping outside the building that connects the transfer tank to the aerosol process in production area. Mr. Erekson provided a photo of the foil wrapping around the piping via email. Mr. Erekson stated they used the foil for protection from the elements. Inside the manufacturing area, it was observed the fire suppression system was last inspected in 2018. Mr. Erekson stated they paid outside vendor to conduct annual

inspections on the system but the inspection was not completed. Mr. Erekson confirmed that 2018 was the last year the fire suppression system was inspected. Finally, the EPA inspectors observed the main entrance that could be used as an emergency exit was partially blocked with pallets of manufactured product. All other exits that could be used as emergency exits had no quick escape system, had manual locks, or were blocked.

The following observations were made during the records review process:

Process Hazard Analysis (PHA)

- Some recommendation actions from the 2019 PHA were not resolved in a timely manner or at all*
- The completion of some recommendation actions was not documented*

Training

- At the time of the inspection, no training records were provided for both initial and refresher training for employees*
- No contractor training

Contractors

- No contractor program was in place at the Facility as Chem Tech personnel did not believe they have any contractors.
- A third party is used for AB-80 delivery to the horizontal storage tank.

Compliance Audit

- The Facility received compliance audit report and deficiencies a day prior to the inspection date. All deficiencies found were still in progress to get fixed.

Mechanical Integrity

- No documentation of training of personnel for mechanical integrity*

Hazard Assessment

- No documentation on parameters used for Offsite Consequence Analysis
- The Facility did not use maximum quantity in vessel of process chemical and release duration of ten minutes. The Facility used five minute release duration for both worse and alternate case scenarios*

Process Safety Information (PSI)

- The Facility had no certification of Recognized and Generally Accepted Good Engineering Practices*
- No list of codes and standards used in the process*
- No electrical classification*

Operating Procedures

- Terminology between different operating procedures is not consistent
- Safety and health considerations not included in operating procedures*

*Chem Tech personnel stated that the above bullet point was also a finding in their 2022 audit report

Photos and/or Videos: were not taken during the inspection.

- EPA inspectors did not take any photos, but one photo was taken by Cameron Erekson and provided to EPA via email

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

The following documents were uploaded to a shared OneDrive folder by Chem Tech personnel prior to and during the inspection:

1. AB-80 Process P&ID.pdf
2. Aeropres LP Training.pptx
3. Aeropres Transport Unloading.pdf
4. Blank PM Schedule.pdf
5. Canister Production SOP.pdf
6. Chem Tech Documentation Summary.pdf
7. Chem Tech ERP.pdf
8. Chem Tech RMP Audit Report Final Compiled 0822.pdf
9. Classroom Training PowerPoint.pptx
10. Compressed Gas Cylinders Storage and Self-Inspection Checklist.pdf
11. Contractor Policy.pdf
12. Employee Feedback Forms.pdf
13. EWU- Propane and Propane Tank Safety Guide.pdf
14. Filling Tanks SOP.pdf
15. Gassing Table SOP.pdf
16. Hot Work Permit Form.pdf
17. Hot Work Permit.pdf
18. Initial PHA.pdf
19. LEPC Emergency Response Plan Email.msg
20. LEPC Initial Email of Coordination Request.msg
21. LEPC Next Meeting Email.msg
22. Management of Change.msg
23. MOC Form.msg
24. O&M LP Gas Handbook.pdf
25. Off-Site Consequence Analysis.pdf
26. Pre-Start Up Review Form.pdf
27. Pre-Start Up Review.pdf
28. Process Safety Information.pdf
29. Response to Alarms SOP.pdf
30. SDS- AB80.pdf
31. Subsystem 1 Bull Storage Tank.pdf
32. Subsystem 2 Transfer Tanks.pdf

33. Subsystem 3 Container Filling.pdf
34. Written Employee Participation Plan.pdf

EPA inspectors reviewed several documents in each category while on-site at the Facility.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Compliance Assistance: All records review observations outlined in this report were shared with Chem Tech.

Concerns: Records review observations outline concerns with Chem Tech's Risk Management Plan. No windsock visible on the Southeast emergency exit. The automatic fire suppression system was last inspected in 2018. The main emergency exit was partially blocked by pallets of manufactured product. The foil on the piping that connects the transfer tank to the aerosol process may impede the ability to assess piping integrity.

DIGITAL SIGNATURES

Report Author: JASON SCHENANDOAH Digitally signed by JASON SCHENANDOAH Date: 2022.10.05 13:32:25 -05'00'

Section Supervisor: NATHAN FRANK Digitally signed by NATHAN FRANK Date: 2022.10.07 10:43:44 -05'00'